

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America
v.

TYRONE ZEIGLER

Case No. 21-mj-160

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Nov. 2-6, 2020, and Sept. 3, 2020 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 2251(a)

Manufacturing and attempted manufacturing of child pornography

18 U.S.C. 2252(a)(2)

Distribution of child pornography

See Attachment A.

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

s/ Brian Coughlin

Complainant's signature

Brian Coughlin, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 1/28/2021

/s/ Lynne A. Sitarski

Judge's signature

City and state: Philadelphia, PA

Honorable Lynne A. Sitarski

Printed name and title

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

I, Brian Coughlin, being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent with the Federal Bureau of Investigation ("FBI") for 19 years, and I am currently assigned to the Philadelphia Division's Violent Crime Against Children Squad. While employed by the FBI, I have investigated federal criminal violations related to white collar, public corruption, counter terrorism, violent crimes against children, and the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, training at the Violent Crimes Against Children Unit of the FBI, various conferences involving Crimes Against Children, and everyday work related to conducting these types of investigations. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. The statements in this Affidavit are based in part on my investigation of this matter and on information provided by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that TYRONE ZEIGLER, date of birth February 12, 1999, committed violations of 18 U.S.C. § 2251 which makes it a crime to employ, use, persuade, induce, entice, or coerce any minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and any attempts to do so, and

committed violations of 18 U.S.C. § 2252(a)(2) which makes it a crime to receive or distribute visual depictions of minors engaging in sexually explicit conduct, and any attempts to do so.

LEGAL AUTHORITY

4. Title 18, United States Code, Section 2251 prohibits a person from employing, using, persuading, inducing, enticing, or coercing any minor to engage in any sexually explicit conduct, and any attempts to do so, for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live depiction of such conduct, if such person knows or has reason to know the visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, if the visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

5. Title 18, United States Code, Section 2252(a) prohibits a person from knowingly transporting, shipping, receiving, distributing, reproducing for distribution, possessing, or accessing with intent to view any visual depiction of minors engaging in sexually explicit conduct, produced using a minor engaged in such conduct, when such visual depiction was either mailed or shipped or transported in interstate or foreign commerce, or in or affecting interstate commerce, by any means, including by computer, or when such visual depiction was produced using materials that had traveled in interstate or foreign commerce, and any attempts to do so.

FACTS SUPPORTING PROBABLE CAUSE

6. On January 24, 2020, Dropbox, Inc. (“Dropbox”)¹ filed CyberTipline Report 63424405 with the National Center for Missing and Exploited Children (“NCMEC”), reporting

¹ Dropbox is a file syncing and collaboration service that allows users to upload, download, access and share files (including image and video files) on computers, phones, tablets, and the Dropbox website. The Dropbox service allows its users to store files on Dropbox’s servers.

that a Dropbox user with User ID “1144645216,” screen/user name: “TYRONE ZEIGLER,” and email address: “TYRONEZEIGLER2@GMAIL.COM,” uploaded suspected child pornography images to his or her Dropbox account. Dropbox provided 38 of these suspected child pornography files to NCMEC. Personnel from Dropbox reviewed the files prior to submitting the report. Your Affiant reviewed the files identified by Dropbox, and in your Affiant’s opinion based on my training and experience, some of the files depict child pornography within the meaning of 18 U.S.C. § 2256. Examples from these files include the following videos:

- a. On April 10, 2019, at 22:45:27, the user uploaded a video file titled “1_5120631023004024854.mp4” into a folder titled “young sale.” The file is an approximately 14 second video which depicts a minor male child, approximately 3 to 6 years of age, standing fully clothed with a hood partially covering his face being penetrated orally by an erect adult penis.
- b. On April 10, 2019, at 22:45:27, the user uploaded a video file titled “YWllcx841-f4rWUe.mp4” into a folder titled “young sale.” The file is an approximately 45 second video which depicts the close-up of an erect adult penis anally penetrating a pre-pubescent male.

7. In addition to the files described above, Dropbox provided several login Internet Protocol (“IP”) addresses to the account, which included the most recent login from IP address 2607:fb90:62b8:6156:f99c:34bc:5c35:6108 on January 13, 2020 at 5:00:44 UTC. According to a database available to law enforcement, IP address 2607:fb90:62b8:6156:f99c:34bc:5c35:6108 resolves to T-Mobile.

8. In response to an Administrative Subpoena issued by the Philadelphia Division of the FBI, T-Mobile identified the mobile telephone number using IP address

2607:fb90:62b8:6156:f99c:34bc:5c35:6108 on January 13, 2020 at 05:00:44 UTC as 484-840-6764, and the subscriber of this telephone number was identified as TYRONE ZEIGLER, 1662 Granite Street, Philadelphia, PA 19124.

9. On May 13, 2020, investigators obtained a federal search warrant authorizing a search of the Dropbox account associated with user ID 1144645216, screen/user name “TYRONE ZEIGLER” and email address TYRONEZEIGLER2@GMAIL.COM. *See* Mag. No. 20-766-M.

10. On June 2, 2020, Dropbox provided records in response to that warrant. The full name on the account is TYRONE ZEIGLER, the email address is tyroneZeigler2@gmail.com and the account was created on May 5, 2018.

11. A review of files found within the Dropbox account associated with ZEIGLER identified over 60 image and video files that, based on my training and experience, depict child pornography within the meaning of 18 U.S.C. § 2256. The 60 files were found within the file folder titled “Lil niggas.” An example of two of these files are described below:

- a. Video file “1d2ecf61-b244-4e15-bafb-cd1657fb8616.mp4” is an approximately 34 second video, which depicts a minor male child, approximately 3 to 5 years of age being penetrated orally by an erect adult penis.
- b. Video file “b34db0d9-c0d0-40dc-b5bd-50508a72d50e.mp4” is an approximately 1 minute and 2 second video, which depicts a minor male child, approximately 5 to 7 years of age being penetrated orally by an erect adult penis.

12. Investigators then determined that ZEIGLER was no longer residing at 1662

Granite Street, Philadelphia, PA 19124. A search of Pennsylvania state agency records revealed the following:

- a. Pennsylvania Department of Motor Vehicle records for ZEIGLER identifies a current driver's license Number 32686385 in the name of TYRONE ZEIGLER, at 5131 Oxford Avenue, Philadelphia, PA 19124, with a date of birth February 12, 1999; and
- b. Pennsylvania Department of Labor and Industry Records identifies TYRONE ZEIGLER, social security account number XXX-XX-4297 (known to your Affiant but omitted here to protect the confidentiality of his biographical information). This record lists ZEIGLER's employment from the first and second quarters of 2020 as Rackson Restaurants, LLC.

13. On September 8, 2020, your Affiant contacted an employee in the payroll department at Rackson Restaurants, LLC who confirmed that ZEIGLER was, in fact, employed at one of their restaurants: Burger King, located at 2550 Welsh Road, Philadelphia PA 19152. When ZEIGLER applied for the job, he supplied his address as 5131 Oxford Avenue, Philadelphia, PA 19124 and his cell number as 484-840-6764.

14. According to T-Mobile records, cell number 484-840-6764 is the T-Mobile telephone number that used IP address 2607:fb90:62b8:6156:f99c:34bc:5c35:6108 to access TYRONE ZEIGLER's Dropbox account on January 13, 2020 at 05:00:44 UTC, as described in Paragraphs 7-8, above.

15. On October 8, 2020, investigators obtained a federal search warrant for the person of TYRONE ZEIGLER with date of birth 02/12/1999 to seize electronic devices and search them for evidence of violations of 18 U.S.C. § 2252. *See* Mag. No. 20-1664-M.

16. On October 14, 2020, the search was executed on TYRONE ZEIGLER with date of birth February 12, 1999. During the search, the following items were found and seized: (1) an Apple iPhone A1784 with serial number FCMT51C1HG04, found on ZEIGLER's person; and (2) an Apple iPhone A1634 with serial number C392NJT0GRWT, found inside of the main compartment of the backpack ZEIGLER carried during the execution of the search.

17. Subsequent to the search, ZEIGLER agreed to a recorded interview with your Affiant and another law enforcement agent. Prior to the interview, ZEIGLER was advised that he was not under arrest, was not in custody and did not have to speak with agents. In pertinent part, ZEIGLER admitted to the following:

- a. ZEIGLER confirmed that his cell phone number is 484-840-6764.
- b. ZEIGLER confessed that child pornography would be found on both of his cell phones.
- c. ZEIGLER stated he is into "age play" and "race play," and prefers boys and girls between the ages of 10 and 14 years old.

18. ZEIGLER initially stated in the October 14, 2020 interview that he did not know about the Dropbox account associated with the email account TYRONEZEIGLER2@GMAIL.COM, but later in the same interview admitted that he owned and had control of the Dropbox account associated with TYRONEZEIGLER2@GMAIL.COM before the account was disabled by Dropbox. ZEIGLER also stated in the interview that he received links to child pornography from other Dropbox users and downloaded the child pornography into his Dropbox account. ZEIGLER said he added images and videos to the account in 2019 before the account was disabled by Dropbox.

19. ZEIGLER also stated during the October 14, 2020 interview that he uses multiple

mobile applications, including “Snapchat”² and “Telegram.”³ He stated that when he gets an urge to view child pornography, he reviews past text conversations on Telegram. ZEIGLER said that the Telegram application contains images of child pornography, and he masturbates to the images. ZEIGLER stated he had the fantasy urge a couple days prior to the interview and masturbated to the images. ZEIGLER stated he feels extremely bad after masturbating to these images.

20. The Telegram application was, in fact, found on ZEIGLER’s cell phone. Your affiant conducted a preliminary review of the Telegram application conversations saved on ZEIGLER’s cell phone (Apple iPhone with serial number FCMT51C1HG04). During this review, ZEIGLER’s cell phone was on airplane mode, and was not connected to the internet—the review was thus limited to the contents of the Telegram application that were saved on ZEIGLER’s device. There were a number of conversations with different individuals in which ZEIGLER exchanged child pornography and discussed sexually abusing children. A preliminary review showed that from April 2019 through October 12, 2020, ZEIGLER distributed at least 49 videos to 17 different users. Based on my training and experience, these distributed videos depict child pornography as defined in 18 U.S.C. § 2256. The Telegram application also showed that ZEIGLER received at least 13 videos, based on my training and experience, depict child pornography, as defined in U.S.C. § 2256, from six individuals. For instance:

² Snapchat is a mobile application that provides users the ability to share photos, videos and text messages. Shareable content includes: snaps, stories, memories and chats. “Snaps” allow a user to take photos or videos using their mobile device’s camera in real-time and then send those photos or videos to any of their Snapchat “Friends” or in a story or chat. “Stories” are collections of snaps displayed in chronological order. “Memories” is Snapchat’s cloud-storage service. Users can save their sent or unsent snaps, posted stories, and photos and videos from their phone’s photo gallery in Memories.

³ Telegram is a free messaging mobile application (or “app”) that can be used on phones, tablets and computers at the same time and messages sync across all of the devices. Telegram users can send messages, photos, videos and files of any type, as well as create groups for up to 200,000 people or channels for broadcasting to unlimited audiences. Telegram also provides end-to-end encrypted voice and video calls as well as voice chat in groups for multiple participants.

- a. On September 3, 2020, ZEIGLER Telegram chat conversation with an individual with the username “Freaky Zeaky” and told Freaky Zeaky: “I wanna see some kids suckin dick.” On the same day, ZEIGLER distributed five child pornography videos to Freaky Zeaky. One video distributed by ZEIGLER on September 3, 2020 was a 34 second video depicting a minor boy child who appears to be between 4 – 6 years old being penetrated orally by an erect adult penis. The minor boy, who is not wearing a shirt, is standing next to a bed where the adult male is laying down. Another video distributed by ZEIGLER was a 17 second video depicting a minor girl child who appeared to be between 4 – 6 years old being penetrated orally by an erect adult penis.
- b. Also on September 3, 2020, ZEIGLER received on Telegram a 33 second video depicting a minor boy child who appeared to be approximately 4 – 6 years old being penetrated orally by an erect adult penis. The minor boy is sitting on the edge of a bed and is wearing green shorts and not wearing a shirt. The adult male holds the back of the minor’s head while his penis is inside the minor boy’s mouth. The adult male ejaculates on the minor’s face. ZEIGLER also received a 14 second video depicting a minor boy who appeared to be approximately 6 – 8 years old being penetrated orally by an erect adult penis. The minor boy and the adult male are both standing and the minor boy appears to be naked. The adult male ejaculates on the minor’s face.

21. ZEIGLER also stated that he engages in a “little bit of catfishing here and there”⁴ and pretends that he is a girl to talk to “guys of my age” and sent nude images of women who

⁴ “Catfishing” refers to communicating with others online while pretending to be someone else.

were “of age.” ZEIGLER understood that “of age” meant “18.” At the conclusion of the interview, ZEIGLER stated: “I will never, ever do this again.”

22. Several months after the interview, on January 8, 2021, Tyrone ZEIGLER agreed to another interview at the Philadelphia FBI office. Prior to the interview, ZEIGLER was advised that he was not under arrest, not in custody and did not have to speak with your Affiant. In pertinent part, ZEIGLER admitted to the following:

- a. After being interviewed by your Affiant on October 14, 2020, ZEIGLER purchased a new replacement iPhone.
- b. ZEIGLER admitted he was catfishing a 16-year-old boy on Snapchat and specifically provided the boy’s name. ZEIGLER admitted that he knows this boy victim in real life and ZEIGLER is certain the boy is now 16 years old. ZEIGLER’s Snapchat account username is THELASTOFARIAA. The boy is known by your Affiant but his name has been omitted here to protect his identity and will be referred to as Minor #1.
- c. ZEIGLER provided Minor #1’s Snapchat username, which is known by your Affiant but omitted here to protect Minor #1’s identity.

23. During the January 8, 2021 interview, ZEIGLER voluntarily opened the Snapchat application on his phone and opened the chat log with Minor #1. While ZEIGLER was flipping through the chat log in your Affiant’s presence, your Affiant observed a video of an unknown male masturbating. Your Affiant asked ZEIGLER for the identity of the individual who was masturbating, ZEIGLER stated it was Minor #1.

24. ZEIGLER then provided signed, written consent to search his recently-obtained Apple iPhone A2111 with serial number DX3DNE7WN72N, and the Snapchat account

“THELASTOFARIAA”.

25. After ZEIGLER provided written consent, a law enforcement agent took screenshots and a video recording of the Snapchat conversation between ZEIGLER and Minor #1.

26. The chat conversation between ZEIGLER and Minor #1 on Snapchat occurred between November 2, 2020 (approximately two weeks after ZEIGLER’s interview with federal agents) through January 8, 2021, and most of the chat was sexual in nature. ZEIGLER was pretending to be an adult female and was talking to Minor #1 about sex and about meeting in person. ZEIGLER sent sexually explicit videos that appeared to be adult pornography to Minor #1, and asked Minor #1 to send sexually explicit videos and pictures of himself in return.

27. On November 2, 2020, ZEIGLER told Minor #1 on Snapchat: “Send me sum and I’ll send something.” Then ZEIGLER says: “I just wanna know why does your dick look so thick.”

28. Then, the next day, on November 3, 2020, ZEIGLER pressured Minor #1 to record a sexually explicit video of himself in the shower:

ZEIGLER: I wanna see something good ... something risky lol You home alone?

Minor #1: Yea

ZEIGLER: Walk around with that dick out

Minor #1: Lol wht im getting in return

ZEIGLER: You’ll see But you gotta make it a good video one I can save in the chat

Minor #1: Rd give me a lil cause I was bout to get in the shower

ZEIGLER: Ooolll do a hands free video in the shower like sit on the phone on something so you can record

Minor #1: Lol rd ill do that

Then, ZEIGLER tells Minor #1 that he is at work, and that he will be back “at 12.”

29. On November 4, 2020, ZEIGLER messaged Minor #1 on Snapchat again and sent him additional images of an adult female, as ZEIGLER continued to pretend to be the same adult

female throughout his conversations with Minor #1. Then, ZEIGLER again asked Minor #1 to send an image of himself, saying: “Show me what imma be handling.” ZEIGLER then responded: “You gotta send me some good as freak ones but the one you just sent [emoji with heart eyes] why is ya dick so thick.” This indicates that Minor #1 had sent videos of his genitals, though the recording was not saved on Snapchat because Minor #1 later deleted the recordings from the chat.

30. Later, on November 4, 2020, ZEIGLER continued to ask Minor #1 for recordings of Minor #1, and Minor #1 eventually pushed back, stating: “but I mad [*sic*] a vid in the shower u never sent nun I did sum another jawns nd u didn’t send anything so ... imma be waiting.”

31. On November 6, 2020, ZEIGLER asked Minor #1: “Why you delete all the ones [videos] you sent?” to which Minor #1 responded: “U was acting weird ... U was asking me to send risky stuff but was sending plain stuff ... just aint feel right.” Based on my training and experience, I understand that when one user in a Snapchat conversation deletes an image or video from the chat conversation, the image or video is deleted entirely from that conversation for both chat users. Accordingly, when Minor #1 deleted the images and videos that he sent, it was also deleted from the chat log on ZEIGLER’s Snapchat application.

32. On November 6, 2020, ZEIGLER sent Minor #1 a video of a female masturbating her vagina, as ZEIGLER continued to pretend to be the same adult female in his conversations with Minor #1. ZEIGLER and Minor #1 engaged in a sexual chat about oral sex and ZEIGLER asked Minor #1 to send something back. Minor #1 sent ZEIGLER a video of a male masturbating his penis.⁵ ZEIGLER appeared to understand that this video was a depiction of Minor #1 because ZEIGLER stated: “Idk why but I thought you was a moaner,” to which Minor

⁵ As explained below, in Paragraphs 34-37, Minor #1 confirmed that he did, in fact, record and send videos of himself masturbating at ZEIGLER’s request. Minor #1 was 15 years old at that time.

#1 responded: “Lol not really.” Minor #1 asked ZEIGLER to send something back and ZEIGLER sent another video of an adult female masturbating her vagina.

33. On January 25, 2021, your Affiant located Minor #1 and conducted an interview with parental consent. Minor #1 stated his date of birth is XX/XX/2004 (known to your Affiant but omitted here to protect Minor #1’s identity) and he is currently 16 years old. Minor #1 confirmed that his Snapchat account is the account known to your Affiant provided by ZEIGLER, but is omitted here to protect Minor #1’s identity.

34. Minor #1 recalled communicating with a Snapchat user using the username THELASTOFARIAA (ZEIGLER’s account). Minor #1 was shown the Snapchat conversations between Minor #1 and ZEIGLER, and Minor #1 confirmed those as their conversations. Minor #1 stated he believed the person he was chatting with was an 18-year old female. Minor #1 first met ZEIGLER – who was posing as the female - on the Instagram mobile application prior to chatting on Snapchat. Minor #1 told “THELASTOFARIAA” (ZEIGLER) that he was 16 years old. Minor #1 advised that they last chatted approximately two weeks ago, in early January 2021.

35. According to Minor #1, he sent “THELASTOFARIAA” (ZEIGLER) two videos he took of himself masturbating his penis. Minor #1 was 15 years old at the time. Minor #1 stated he recorded and sent the videos at ZEIGLER’s request and used the camera feature in Snapchat to record them. They were not videos he already had saved on his phone.

36. After sending the two videos, Minor #1 deleted them from their Snapchat conversation, which also deleted them on ZEIGLER’s end of the conversation. ZEIGLER asked Minor #1 why he deleted the videos since ZEIGLER could not see them anymore, so on November 6, 2020, Minor #1 re-sent the second video he recorded of himself masturbating back to “THELASTOFARIAA” (ZEIGLER). This video is the same as one of the videos Minor #1

previously recorded of himself masturbating which he recorded and sent to ZEIGLER at ZEIGLER's request.

37. Minor #1 stated he no longer has the two videos he recorded of himself masturbating and does not remember the exact date he recorded them, but he recorded them and sent them to "THELASTOFARIAA" (ZEIGLER) at ZEIGLER's request. The Snapchat messages do not indicate when they were first sent since he deleted them from the Snapchat conversation, but Minor #1 stated he recorded them sometime between November 2, 2020, when he first started chatting with "THELASTOFARIAA" (ZEIGLER) on Snapchat, and November 6, 2020, when he re-sent the second video of himself masturbating to "THELASTOFARIAA" (ZEIGLER). This is confirmed by the Snapchat conversations between ZEIGLER and Minor #1. It appears that Minor #1 may have sent the first sexually explicit video on November 2, 2020, when ZEIGLER commented to Minor #1, "I just wanna know why does your dick look so thick." Minor #1 may have sent the second video on November 4, 2020, when ZEIGLER made the following comment to Minor #1, "You gotta send me some good as freak ones but the one you just sent [emoji with heart eyes] why is ya dick so thick."

38. During the interview, Minor #1 showed your Affiant the Instagram conversations between Minor #1 and ZEIGLER, who was posing as the adult female. The Instagram conversations reveal that ZEIGLER and Minor #1 started chatting on Instagram on October 11, 2020 and their last message on Instagram was on November 2, 2020, after which they started to chat on Snapchat. These Instagram messages confirm that Minor #1 told ZEIGLER he was 16 years old, and ZEIGLER told Minor #1 he was 20 years old. Throughout the chats on Instagram and Snapchat, ZEIGLER maintained he was a female and used female pictures as his profile on Instagram.

39. Your Affiant first encountered ZEIGLER on October 14, 2020 to interview him and execute a federal search warrant. At that time, ZEIGLER had already been communicating with Minor #1. Even after he was interviewed on October 14, 2020, ZEIGLER continued to communicate with Minor #1 and later between November 2, 2020 and November 6, 2020, persuaded Minor #1 to produce sexually explicit videos at his request.

CONCLUSION

40. Based upon the information above, I respectfully submit that there is probable cause to believe that TYRONE ZEIGLER, date of birth February 12, 1999, did employ, use, persuade, induce, entice, or coerce a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and did attempt to do so, in violation of 18 U.S.C. § 2251, and did distribute visual depictions of minors engaging in sexually explicit conduct, in violation of 18 U.S.C. § 2252(a)(2), as more fully set forth in Attachment A.

41. Therefore, I respectfully request that the attached arrest warrant be issued authorizing the arrest of TYRONE ZEIGLER.

REQUEST FOR SEALING

42. Your affiant requests that this Court issue an Order that the arrest warrant, affidavit and application, and all accompanying documents, be filed under seal. Disclosure of this information would compromise this ongoing investigation by alerting the subjects of this investigation and likely causing them to flee and/or destroy evidence. Accordingly, I respectfully request that the arrest warrant specified above be issued and that the same be filed under seal.

s/ Brian Coughlin

BRIAN COUGHLIN
Special Agent
Federal Bureau of Investigation

SWORN TO AND SUBSCRIBED
BEFORE ME THIS 28th DAY
OF JANUARY, 2021.

/s/ Lynne A. Sitarski

HONORABLE LYNNE A. SITARSKI
United States Magistrate Judge

ATTACHMENT A

Count One – Manufacture and Attempted Manufacture of Child Pornography – 18 U.S.C. § 2251(a), (e)

Between on or about November 2, 2020 and on or about November 6, 2020, in the Eastern District of Pennsylvania, defendant TYRONE ZEIGLER knowingly employed, used, persuaded, induced, enticed, or coerced Minor #1, a person under the age of 18 years, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and attempted to do so, using materials that have been mailed, shipped, or transported in and affecting interstate and foreign commerce.

Count Two – Distribution of Child Pornography – 18 U.S.C. Section 2252(a)(2), (b)(1)

On or about September 3, 2020, in the Eastern District of Pennsylvania, TYRONE ZEIGLER knowingly distributed visual depictions using any means and facility of interstate and foreign commerce, and that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, the producing of which involved the user of minors engaged in sexually explicit conduct, and the visual depictions were of such conduct.